

1 Michael J. Gearin, WSBA # 20982  
2 David C. Neu, WSBA # 33143  
3 Brian T. Peterson, WSBA # 42088  
4 K&L GATES LLP  
5 925 Fourth Avenue, Suite 2900  
6 Seattle, WA 98104-1158  
7 (206) 623-7580

Honorable Christopher M. Alston  
Chapter 11  
Hearing Location: Seattle, Rm. 7206  
Hearing Date: September 1, 2017  
Hearing Time: 9:30 a.m.  
Response Date: August 25, 2017

8 UNITED STATES BANKRUPTCY COURT  
9 WESTERN DISTRICT OF WASHINGTON  
10 AT SEATTLE

11 In re:

12 NORTHWEST TERRITORIAL MINT, LLC,  
13 Debtor.

Case No. 16-11767-CMA

DECLARATION OF JODY CANNADY IN  
SUPPORT OF TRUSTEE'S SECOND  
MOTION FOR ORDER GRANTING  
AUTHORITY TO RETURN STORED  
INVENTORY TO CUSTOMERS

15 I, Jody Cannady, hereby declare as follows:

16 1. I submit this Declaration in support of the Trustee's Second Motion for Order  
17 Granting Authority to Return Stored Inventory to Customers (the "Motion"). I am over eighteen  
18 (18) years of age, and I am competent in all ways to testify.

19 2. I am an accountant for Cascade Capital Group, LLC. On April 14 through April 19,  
20 2016, I led the inventory process at Northwest Territorial Mint, LLC's ("NWTM" or the "Debtor")  
21 Federal Way, Washington facilities (the "Federal Way Office") and on April 20 through April 22,  
22 2016 I led the inventory process at NWTM's Auburn, Washington facilities (the "Auburn Office")  
23 (collectively, the Washington Offices). In connection with my inventory of precious metals at the  
24 Washington Offices, I secured and identified inventory marked as storage inventory for specific  
25 customers (the "Stored Inventory"). In particular, I confirmed the existence, identification and  
26

DECLARATION OF JODY CANNADY IN SUPPORT OF  
SECOND MOTION FOR ORDER GRANTING  
AUTHORITY TO RETURN STORED INVENTORY - 1

500481068 v1

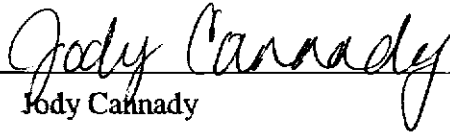
K&L GATES LLP  
925 FOURTH AVENUE  
SUITE 2900  
SEATTLE, WASHINGTON 98104-1158  
TELEPHONE: (206) 623-7580  
FACSIMILE: (206) 623-7022

1 location of certain Stored Inventory. During the inventory process, Derrin Tallman took  
2 photographs of inventory located at the Washington Offices. See Supplemental Declaration of  
3 Derrin Tallman in Support of Motion for Order Granting Authority to Return Stored Inventory,  
4 Other Customer Owned Inventory, and Coining Dies [Dkt. 622].

5 3. Through my personal inspection of the inventory, I discovered that two 100 oz. Pan  
6 American silver bars were stored in safe 2, shelf 2 in NWTM's Auburn, WA, facility, and that these  
7 bars were labeled with a post-it note with the name "Arnold Abrams." Attached hereto as Exhibit A  
8 is a copy of a photograph of the silver bars taken during the inventory process.

9 I declare under the penalty of perjury under the laws of the United States that the foregoing is  
10 true and correct to the best of my knowledge.

11 EXECUTED this 25<sup>th</sup> day of July, 2017, at Seattle, Washington.

12  
13   
14 Jody Cannady

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
DECLARATION OF JODY CANNADY IN SUPPORT OF  
SECOND MOTION FOR ORDER GRANTING  
AUTHORITY TO RETURN STORED INVENTORY - 2

500481068 v1

K&L GATES LLP  
925 FOURTH AVENUE  
SUITE 2900  
SEATTLE, WASHINGTON 98104-1158  
TELEPHONE: (206) 623-7580  
FACSIMILE: (206) 623-7022

# EXHIBIT A

~~Art~~  
Arnold Abrams

Pan American  
Silver Corp.

100 TROY OUNCE BAR  
999+ FINE SILVER

0034192



Pan American  
Silver Corp.

100 TROY OUNCE BAR  
999+ FINE SILVER

018041

Weight

13.880

Unit Weight

0

Count

0

Net Stable Zero 1D Kg

Sample Preset U. Weight

Memory

Charging

ADAM

1

2

3

4

5

.

Do Not change